

Representing Management Exclusively in Workplace Law and Related Litigation



# MEMO ENDORSED

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May 21, 2020

**VIA ECF**

Honorable Katherine Polk Failla  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 40 Foley Square  
 New York, New York 10007

**Re: Johnston v. Electrum Partners, LLC et al.**  
Case No. 1:17-cv-7823 (KPF)

Dear Judge Failla:

We represent Defendants Electrum Partners, LLC (“Electrum”) and Leslie Bocskor (“Bocskor”) in the above-referenced matter. We write to request permission to redact certain information contained within Jackson Lewis P.C.’s (“Jackson Lewis” or the “Firm”) Motion to Withdraw as counsel of record for Defendants and accompanying Declaration of Joshua A. Sliker, and submit an unredacted copy of the Motion and Declaration for review *in camera*.

Counsel is bound by the attorney-client privilege and the duty of confidentiality set forth in Rule 1.6 of the New York Rules of Professional Conduct. Specifically, Rule 1.6(a) states that “confidential information” includes information gained during or relating to the representation of a client that is “(b) likely to be embarrassing or detrimental to the client if disclosed.” Redaction of certain portions of the motion and declaration is necessary because they contain sensitive and confidential information regarding the reasons that Jackson Lewis seeks to withdraw as counsel of record. Given that the underlying arbitration proceedings remain ongoing, the redacted information in the motion and declaration is likely to be embarrassing and detrimental to Defendants, and may operate to prejudice Defendants.

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Based on the foregoing, Jackson Lewis requests that the Court grant this letter motion as follows:

1. Jackson Lewis shall file a redacted version of its motion to withdraw and declaration in accordance with Rule 9(B) of Your Honor's Individual Rules, and shall serve the same on Defendants and all other counsel.
2. Jackson Lewis shall provide an unredacted version of its motion to withdraw and declaration to the Court for *in camera* review in accordance with Rule 9(B) of the Your Honor's Individual Rules.

Very truly yours,

JACKSON LEWIS P.C.

Joshua A. Sliker  
John A. Snyder

cc: John T. Brennan, Esq. (via ECF)

4821-6162-0412, v. 1

Application GRANTED. The Clerk of Court is directed to maintain Dkt. #49 and 50 with viewing privileged granted only to Joshua Alan Sliker, counsel for defendants, and the Court. Docket #47 and 48 shall remain on the docket in redacted form.

Dated: May 26, 2020  
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE